



201-15282

175 Ghent Road  
Fairlawn, OH 44333-3300

Tel: 330-869-4335  
Fax: 330-869-4272  
John.finn@omnova.com

John F. Finn, Director  
Environmental Affairs

April 26, 2004

Administrator  
US Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attention: Chemical Right To Know

RECEIVED  
OPPT 0310  
04 MAY 18 PM 1:05

Re: HPV Challenge Program Status Inquiry, CAS Number 3001-61-4

Ladies & Gentlemen:

We recently received a letter from Charles M. Auer indicating that OMNOVA Solutions Inc. was overdue on a commitment under the HPV Challenge Program. The specific chemical referenced was: CAS Number 3001-61-4, 2-Imidazolidinone, 4,5-dihydroxy-1,3-bis(methoxymethyl)-, with a start year of 2001. A copy of Mr. Auer's letter is enclosed for reference.

While the SOCMA Urea Resins Group (which includes OMNOVA) had originally agreed to sponsor this chemical, this sponsorship was withdrawn as outlined in a letter which was forwarded to EPA on December 3, 2001 (copy attached). As indicated in the letter, none of the current coalition members produce or import this chemical. A copy of the 12/3/01 restated commitment letter can also be found posted on the EPA HPV website.

We trust that this information is responsive to your April 2, 2004 letter inquiry. Let me know if you have any further questions.

Very truly yours,

John F. Finn, Director

Environmental Affairs

Attachments\*

Cc:

R. Kitchen

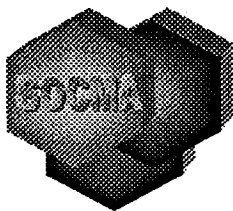
J. LeMay

J. Cooper – SOCMA

W. Smock – SOCMA

R. Hinderer – Noveon

F: HPV\*



## Urea Resins Group

**SOCMA**  
**Urea Resins Group**

1850 M Street, NW, Suite 700, Washington, DC 20036  
(202) 721-4158 – (202) 296-8120 fax

December 3, 2001

**RETURN RECEIPT REQUESTED VIA E-MAIL**

Christine Todd Whitman, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116

Attn: Chemical Right-to-Know Program; HPV Registration Number

Dear Administrator Whitman:

On November 29, 1999 the SOCMA Urea Resins Group (SURG) volunteered to sponsor CAS# 68411 and CAS# 3001-61-4 under the EPA HPV Challenge Program. Earlier this year we were notified that one of the members, Sybron Chemicals, was acquired and would no longer participate in our consortium. Because none of the current members of our consortium are producers or importers of CAS# 3001-61-4, the SURG will not sponsor this chemical.

The Urea Resins Group, therefore, is restating its commitment to sponsor the following chemical.

<u>Chemical</u>	<u>CAS#</u>	<u>Year</u>
2-imidazolidinone, 4,5-dihydroxy-1,3-bis(hydroxymethyl)-, methylated	68411-81-4	2001

The Coalition members are Hickson DanChem Corporation, Noveon, Inc. and OMNOVA Solutions Inc. Although OMNOVA Solutions is no longer a producer or importer of CAS# 68411-81-4, the company feels strongly about working their counterparts in the general urea resins market to help provide valuable information to the public.

SURG is submitting its test plan for CAS# 68411-81-4 with this package. If there are any questions or comments, please feel free to contact me.

Sincerely,

James R. Cooper  
Executive Director

cc: Urea Resins Group



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

APR 20 2004

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Mr. Robert Kitchen  
Omnova Solutions Inc.  
1476 JA Cochran Bypass  
Chester, SC 29706-0070

Dear Mr. Kitchen:

I want to personally acknowledge and thank you for your commitment to the High Production Volume (HPV) Challenge Program. Participation in the HPV Challenge Program has exceeded EPA's expectations and, although the success of the program has been significant, there are a number of commitments that have not yet been met and are considered late. Preparations are underway for release of the HPV Challenge Program Status Report in May, 2004. The HPV Challenge Program Status Report will identify those sponsors whose commitments are overdue.

Our records indicate that your organization has sponsored the chemical(s) listed in the attached table for a start year of 2003 or earlier but robust summary and test plan information has not been received by the Agency. The commitment start year indicates the year of the Program in which sponsors agreed to begin the evaluation of each chemical by submitting robust summaries of existing data and a test plan showing how the sponsor plans to fill any data gaps. Under the HPV Challenge Program, all test plans and robust summary submissions should be submitted in the year indicated. Any needed new testing on the HPV chemicals in the HPV Challenge Program is to be completed by the end of 2004 with all data to be made available to the public by 2005. So that the Agency may meet its HPV Challenge Program's objectives, we are no longer accepting changes to start years and commitments not yet fulfilled are considered late.

While we are not accepting changes to start years, the Agency does expect sponsors to uphold their commitments and submit test plans and robust summaries as soon as possible. If no test plan/robust summary submission is received before the end of 2004 for these commitments, then the Agency will consider these chemicals as "orphans" -or unsponsored. Chemicals not voluntarily sponsored in the HPV Challenge Program will become candidates for test rules under Section 4 of the Toxic Substances Control Act (TSCA).



Recycled/Recyclable  
Printed with Soy/Canola Ink on paper that  
contains at least 50% recycled fiber

The Agency understands that over time, for a variety of reasons, sponsorship plans may change; however, it is incumbent upon sponsors of unmet commitments to update the Agency so that its records may accurately reflect the current commitment status. Information should be sent to:

Administrator  
US Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attention: Chemical Right-to-Know Program

or through e-mail at: [oppt.ncic@epa.gov](mailto:oppt.ncic@epa.gov) and [chem.rtk@epa.gov](mailto:chem.rtk@epa.gov) by April 30, 2004. Please note that any correspondence containing Confidential Business Information (CBI) should not be sent to the above address or through e-mail.

If you have any questions or concerns, please contact Karen Lannon of my staff at 202-564-8163. Thank you.

Sincerely,

Charles M. Auer  
Director  
Office of Pollution Prevention and Toxics

Attachment

**Omnova Solutions Inc. — Overdue Commitments**

CAS Number	9 <sup>th</sup> Collective Index Name	Start Year
3001-61-4	2-Imidazolidinone, 4,5-dihydroxy-1,3-bis(methoxymethyl)-	2001